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*Attorneys for Plaintiff
Kitsch LLC*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

Kitsch LLC, a California
company,

Case No. 2:18-CV-08532 R (JCx)

Plaintiff,

v.

**STIPULATED PERMANENT
INJUNCTION AND ORDER**

CM National Inc., a California
corporation, Noam
Krasniansky, an individual, and
Irene Krasniansky, an
individual,

Defendants.

1 The parties have agreed to the entry of this Consent Judgment. Accordingly, IT
2 IS ORDERED, ADJUDGED, and DECREED:

3 1. Kitsch LLC (“Kitsch”) is a Limited Liability Company organized under
4 the laws of California, having a principal place of business at 307 N. New Hampshire,
5 Los Angeles, California 90004.

6 2. Defendant CM National Inc. (“CM National”) is a corporation organized
7 under the laws of the State of California, having a principal place of business at 1959
8 Blake Ave, Unit L, Los Angeles, California 90039.

9 3. Defendant Noam Krasniansky, an individual, is an adult resident of the
10 State of California.

11 4. Defendant Irene Krasniansky, an individual, is an adult resident of the
12 State of California, and owns stock in and is an officer of Defendant CM National Inc.

13 5. Noam Krasniansky is the owner of valid and enforceable U.S. Design
14 Patent No. 698,996 (the “’996 Patent”).

15 6. Kitsch has ownership rights in U.S. Design Patent No. 709,648 (the “’648
16 Patent”).

17 7. Plaintiff and Defendants have reached settlement terms, which include the
18 licensing of certain rights to Plaintiff Kitsch in relation to the ‘996 Patent.

19 8. This court has subject matter jurisdiction over this action.

20 9. This court has personal jurisdiction over the Defendants in this action,
21 including its officers and owners.

22 10. Venue is proper in this district.

23 11. The above stipulated facts are a material basis for agreement to this
24 Stipulated Order.

1 **IT IS HEREBY FURTHER ORDERED AND ADJUDGED THAT:**

2 12.Pursuant to the terms of the license agreement between Plaintiff and
3 Defendants, Defendants may not rely on or use the '996 Patent (or any other patent,
4 whether currently owned or acquired in the future), or use any other means, to directly
5 or indirectly interfere with or try to stop the sale of Plaintiff's cylindrical single coil
6 hair ties ("Approved Products"), including, but not limited to filing suit against Kitsch,
7 requesting removal of Plaintiff's listings for hair coils via online marketplaces, such as
8 Amazon.com, and further including but not limited to the Amazon Identifiers
9 ("ASINs"):

10 B01G4GPPY4	B072FG5WCH	B07BYRG1G5
11 B01HHGQIXW	B074KTN8PY	B07C1D79YB
12 B01HHGQRZG	B074KTXTZ9	B07DF5PFLK
13 B071Z6QZQ9	B074KVK6H7	B07FP3686J
14 B07232K5Q4	B0769MTT1Z	B07HB937L8
15 B0725N8HHJ	B077GCNMH7	B07HBB3L32
B07288PNFT	B077GDVQL7	

16 This prohibition shall also apply to Plaintiff's manufacturers, suppliers, distributors,
17 retailers, customers, and end users with respect to Plaintiff's Approved Products.
18 Kitsch represents that none of these listed products have a metallic appearance and
19 Kitsch agrees it will not sell any product on Amazon.com with any metallic appearance
20 or components.

21 13.Kitsch, its officers, owners, agents, including but not limited to Jeremy
22 Thurswell or Cassandra Thurswell may not rely on or use the '648 Patent (or any
23 other patent, whether currently owned or acquired in the future), or use any other
24 means, to directly or indirectly interfere with or try to stop the sale of Defendants'
25 hair coils, including, but not limited to claiming any of these listed products infringe
26 on the '648 Patent, or filing suit against Defendants, requesting removal of
27 Defendants' listings for hair coils via online marketplaces, such as Amazon.com, and
28 further including but not limited to the following ASINs:

B07J1S4HVK
B076BYPHP4
B073T4KXNV
B073T4RJWV

B07J1JY2NW
B076C1V2HH
B07CBMLYM9
B07J1XWCX5


B07C148XFD
B07J1MVNY5
B07C12FT1F
B076BW2P8Z

This prohibition shall also apply to Defendants' manufacturers, suppliers, distributors, retailers, customers, and end users with respect to Defendants' products.

14. This Court shall retain jurisdiction over the Settlement Agreement between the parties. The Court shall also retain jurisdiction to enforce this Stipulated Order and the Settlement Agreement between the parties.

15. This Stipulated Order resolves and disposes of all remaining claims and issues between the parties in this case.

SO ORDERED this 2nd day of May, 2019.



Hon. Manuel L. Real
U.S. District Court Judge

This Stipulated Order has been approved as to form and substance by the parties and attorneys of record as indicated by the signatures below:

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KITSCH, LLC

**CM NATIONAL, INC.,
NOAM KRASNIANSKY and
IRENE KRASNIANSKY**

By: /s/ Jeremy Thurswell

Its: COO

By: / s/ Irene Krasniansky

Its: /s/ Noam Krasniansky

By:/s/ William E. Thomson, Jr.
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